

# **EXHIBIT B**

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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SCHUTTE BAGCLOSURES, INC., )

Plaintiffs )

v. )

KWIK LOK CORPORATION, )

Defendant. )

Case No. 12-cv-5541 (JGK)

KWIK LOK CORPORATION, )

Counterclaim Plaintiff )

v. )

AFFIDAVIT OF  
JACOB WILLEMSSEN

SCHUTTE BAGCLOSURES, INC., and )

SCHUTTE BAGCLOSURES B.V., )

Counterclaim Defendants )

JACOB WILLEMSSEN, being duly instructed about the penalty of perjury under the laws of the United States of America (28 U.S.C. § 1746), states under penalty of perjury:

1. I am the Corporate Secretary of Schutte Bagclosures Inc. ("Schutte Inc."), and President of TABS Inc. ("TABS"), and I respectfully submit this Affidavit in Support of Schutte Inc.'s and Schutte BV's Motion to Dismiss Kwik Lok Corporation's Counterclaims for


failure to state a claim against Schutte Inc. and Schutte BV pursuant to Federal Rule of Civil Procedure 12(b)(6) and to dismiss Schutte BV for lack of personal jurisdiction pursuant to Federal Rule of Civil Procedure 12(b)(2).

2. Schutte Inc.'s New York offices have moved to the following address:

228 E 45th Street, Suite 9E  
New York, NY 10017  
United States

3. On or around April 19, 2012, Schutte Inc. engaged TABS Inc., located at the address set forth under § 2 above, to provide back-office services, perform market analysis, and send out samples to potential clients.
4. Schutte Inc. pays all of the TABS invoices relating to these services. TABS Inc. has no contract with Schutte BV.
5. I was involved with market research in New York state for Schutte Inc. to prepare for its possible market entry, and as far as I know Schutte Inc. has not designed, manufactured, offered for sale, and/or sold any products in the United States.
6. To my knowledge, Schutte Inc. does not have any bag-closure device manufacturing capabilities.
7. On behalf of Schutte Inc., TABS Inc. received a small amount of sample boxes shipped from Schutte BV. All of these products were not for sale or commercial use.
8. Schutte Inc. has never entered into a contract in or directed towards the state of New York for the sale, purchase, and/or supply of any products that are the subject of these court proceedings.

DATED: December 20, 2013



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Jacob Willemsen